



Winston H. Hickox  
Agency Secretary

# Air Resources Board

Alan C. Lloyd, Ph.D.  
Chairman

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Gray Davis  
Governor

March 4, 2002

#02-03

Mr. Bolling H. Sasnett, III  
President  
Saber Technologies, LLC  
590 Means Street N.W., Suite 200  
Atlanta, Georgia 30318

Dear Mr. Sasnett:

On January 7, 2002, the California Air Resources Board (CARB) staff responded to Saber Technologies, LLC September 18, 2001 letter regarding a request for changes to Executive Order (EO) G-70-196, SaberVac VR Phase II Vapor Recovery System. In this letter, we stated that additional concerns raised by the California Air Pollution Control Officers Association (CAPCOA), the Bay Area Air Quality Management District (BAAQMD) and Husky Corporation would need to be evaluated prior to CARB issuing a modified Executive Order.

On February 7, 2002, we received an electronic mail message from you. This message requested that one of the corrections be approved prior to completion of the evaluation of the other issues raised. Approval of this request would increase the maximum hose length criteria established on Figures 2A-2, 2A-3 and 2A-4 from 10.5 feet to a new maximum hose length of 13.5 feet.

On February 25, 2002, my staff participated in a conference call with representatives of Saber Technologies and Husky Corporation to discuss this issue. Based upon that discussion, we have determined that the requested modification will not impact the vapor recovery system or affect the vapor recovery efficiency of the SaberVac system for those systems whose hose length criteria is established on Figures 2A-1 and 2A-3 of G-70-196. Retrofits and new installations that require a longer hose length must meet the specifications outlined in note 5 for Figure 2A-1 and note 6 for Figure 2A-3.

The language for both of these notes reads as follows:

*The hose may not touch the island or the ground when not in use. In the case of a dogbone island where the wider island ends protect the hose*

*The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Website: <http://www.arb.ca.gov>.*

California Environmental Protection Agency

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*from damage by vehicle tires, the hose may touch the vertical face of the dogbone island at the option of the local airpollution control district.*

The hose length criteria for configurations shown in Figure 2A-2 will remain at the currently documented 10-1/2 feet. The additional hose loop that would result from this hose length modification could lead to a liquid blockage that will limit the performance of the SaberVac system.

Saber Technologies, LLC is approved to use the new maximum hose length for the SaberVac system on those dispensers that are represented by Figures 2A-1 and 2A-3. This should eliminate field service issues. Once the evaluation of G-70-196 is complete, the modified executive order will include the new maximum hose length.

If you have questions or need additional information, please contact Paul Marzilli at (916) 445-7431 or via email at [pmarzill@arb.ca.gov](mailto:pmarzill@arb.ca.gov), or Laura McKinney at (916) 327-0900 or via email at [lmckinne@arb.ca.gov](mailto:lmckinne@arb.ca.gov).

Sincerely,

A handwritten signature in cursive script, appearing to read "William V. Loscutt".

William V. Loscutt, Chief  
Monitoring and Laboratory Division

cc: Ms. Rosa Salcedo, Chair, CAPCOA Vapor Recovery Committee  
Ms. Ellen Garvey, Executive Officer, BAAQMD